

MARC RODRIGUEZ, OSB No. 201019
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Attorney for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BEA LAKE.,

PLAINTIFF,

v.

CITY OF PORTLAND, a municipal corporation, Portland Police Bureau ("PPB") Police Officer ("P.O") John Doe (the name John Doe being fictitious, as the true name and shield number is not presently known), in their individual capacities,

DEFENDANTS.

3:22-cv-00818-SI

**DEFENDANT CITY OF PORTLAND'S
OFFER OF JUDGMENT**

TO PLAINTIFF BEA LAKE AND HER ATTORNEYS OF RECORD:

Pursuant to Fed. R. Civ. P. 68, Defendant City of Portland hereby offers to allow Plaintiff Bea Lake ("Plaintiff" or "Lake") to take judgment against the City of Portland in the sum of Fifteen Thousand Dollars and Zero Cents (\$15,000.00), plus attorneys' fees and costs in the sum of Ten Thousand Dollars and Zero Cents (\$10,000.00), and the dismissal with prejudice of John Doe from Plaintiff's action. This Offer of Judgment is made for the purposes specified in Rules 54 and 68, Federal Rules of Civil Procedure, and is not to be construed as an admission that City

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of Portland is liable in this action. Any Judgment entered as a result of this offer shall not be construed as an admission of liability.

Acceptance of this offer precludes any other action in the subject matter giving rise to Plaintiff's action against John Doe, City of Portland, or any other officer, agent, or employee of Defendant City of Portland. This offer is explicitly conditioned on precluding any other litigation in any forum by Plaintiff against John Doe, Defendant City of Portland, its officers, agents, or employees arising from or related to the June 7-8, 2020, incident giving rise to Plaintiff's action.

This Offer of Judgment shall not be filed with the Court unless accepted.

Dated: September 13, 2023

Respectfully submitted,

/s/ Marc Rodriguez

MARC RODRIGUEZ, OSB No. 201019
Deputy City Attorney
Attorney for Defendant City of Portland

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANT CITY OF PORTLAND'S OFFER OF JUDGMENT** on the following parties by the method indicated:

Jane L Moisan People's Law Project 818 SW 3rd Ave, #221-3789 Portland, OR 97204 <i>Of Attorneys for Plaintiffs</i>	<input type="checkbox"/> Electronic service - UTCR 21.100 (1)(a) <input type="checkbox"/> Mail in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service. <input type="checkbox"/> Hand delivery <input type="checkbox"/> Facsimile transmission <input checked="" type="checkbox"/> by email.
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Dated: September 13, 2023

/s/ Marc Rodriguez

Marc Rodriguez, OSB No. 201019

Deputy City Attorney

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Of Attorney for Defendant City of Portland